

NOV 05 2009

DAVID CREWS, CLERK
BY *[Signature]* Deputy

NDMS: 3:09cv121M

IN THE CIRCUIT COURT OF MARSHALL COUNTY, MISSISSIPPI

KENNETH JENKINS

PLAINTIFF

VS.

CAUSE NO. CA2009-000406

**JOHN DOE (AN UNKNOWN MOTORIST)
AND STATE FARM INSURANCE COMPANY**

DEFENDANTS

COMPLAINT

COMES NOW, the Plaintiff, Kenneth Jenkins, and for cause of action would respectfully state as follows:

1. Plaintiff, Kenneth Jenkins, is an adult resident citizen of Marshall County, Mississippi, and has been so at all time relevant to this proceeding.
2. The defendant John Doe is an unknown and uninsured motorist for purposes of this action. State Farm Insurance Company, Plaintiff's insurer for such purposes, may be served with process at Corporation Service Company, Registered Agent For State Farm Insurance Company, 506 South President Street, Jackson, Mississippi 39201, all in accordance with Mississippi Code Annotated Section 83-11-105.
3. All acts, for which Complaint is made, occurred in Marshall County, Mississippi.
4. On August 07, 2007, at approximately 3:20 p.m., Plaintiff was the operator of a red Toyota Camry traveling in a southerly direction on Mississippi Highway 7. Plaintiff, in an attempt to overtake a vehicle driven by Defendant John Doe, pulled into the passing lane (or northbound lane). As Plaintiff pulled alongside of John Doe's vehicle, John Doe pulled into the passing lane (or northbound land) and collided with the vehicle operated by Plaintiff forcing him off the road and causing serious property and bodily injuries to Plaintiff. John Doe left the scene of the accident.
5. Defendant negligently caused the two vehicles to collide together, resulting in serious bodily injuries to Plaintiff.

FILED

AUG 04 2009

LUCY CARPENTER
Circuit Clerk, Marshall Co., MS
BY *[Signature]* D.C.

EXHIBIT A

6. As a direct and proximate result of Defendant's negligent act, Plaintiff received serious, painful, disabling temporary and permanent bodily injuries, and other contusions and abrasions which required him to incur, or become liable for, certain reasonable and necessary medical treatment and other expenses.

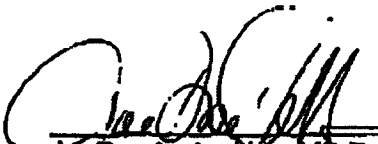
7. As a further direct and proximate result of Defendants' negligence, Plaintiff has suffered mental and physical pain, suffering and other damages to be proven at trial. Leave to amend to provide other and more specific damages is requested.

WHEREFORE, Plaintiffs prays that the Court:

- a. Enter a judgment against the Defendants in favor of the Plaintiff in the amount of One Million and no/100 (\$1,000,000.00);
- b. Allow Plaintiff to amend the Complaint to add such other medical expenses and injuries and records as are available, and;
- d. Award cost of this action and discretionary expenses against the Defendant.
- e. Grant such other and further relief as it deems appropriate.

Respectfully Submitted,

KENNETH JENKINS,
Plaintiff



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